



SEMS DocID

621057

December 9, 1982

Ms. Wendee L. Wright
Fiber Materials, Inc.
Biddeford Industrial Park
Biddeford, Maine 04005

Dear Ms. Wright:

I enjoyed having the opportunity to meet with you last month and apologize for the delay in following up on the key issues discussed at our November 5, 1982 visit. As you remember, we agreed that Fiber Materials, Inc. could convert from a hazardous waste storage facility to "generator only" status by notifying the Maine DEP and the EPA (by copy of letter to DEP) of its intent to store wastes for no longer than 90 days before shipping to an off-site facility. Furthermore, since the plant generates less than 1,000 kg per month of hazardous waste and if you do not plan to store more than 1,000 kg on-site at any one time, you could request to be exempted from the requirements for generators under 40 CFR §261.5 "Special Requirements for Hazardous Waste Generated by Small Quantity Generators".

I have received a copy of your November 15, 1982 letter to Jack Krueger, Maine DEP, requesting that FMI be listed as a small quantity generator. I understand that Doug Gleason of the Portland Office has made plans to inspect the facility to ascertain the appropriateness of this change and I will be in contact with him before making a final determination.

Based on my visit, it appears that the only question would be whether or not FMI should remain a "generator" instead of a "small quantity generator" considering the possibility that the 1,000 kg cutoff limit could be exceeded in the storage area from time to time. This would still give you up to 90 days from that point to ship the waste off-site; it would, however, require you to comply with 40 CFR Part 262 Standards Applicable to Generators of Hazardous Waste.

As far as other on-site processes discussed during our November 5, 1982 visit, the neutralization of the spent Oakite T.M. rinse solution is covered by a "permit-by-rule" and does not require a RCRA permit; the incinerator used to burn off vapors from the carbonization process is not a hazardous waste incinerator and

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

does not require a RCRA permit; and scrubber solutions generated from removing fumes from fiber coating operations are not hazardous unless they meet one of the hazardous waste characteristics found at 40 CFR 261 Subpart C.

If you have any questions or wish to convey further information on this matter, please contact me at (617)223-5630.

Sincerely yours,

William F. Sarro, Environmental Engineer
State Waste Programs Branch

cc: Jack Krueger
Doug Gleason

EPA:lwm:SWPB:B.Sarro:cdr:12/9/82:Disc II

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